## IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ANGELA ADKINS, on behalf of herself and all others similarly situated,

Plaintiff,

Case No. 3:23-cv-00004-RK-JBD

District Judge Robert Kirsch Magistrate Judge J. Brendan Day

V.

EVEREST GLOBAL SERVICES, INC.,

Defendant.

## STIPULATION TO EXTEND DEFENDANT'S TIME TO RESPOND TO AMENDED COMPLAINT

Plaintiff Angela Adkins, ("Plaintiff") and Defendant Everest Global Services, Inc. ("Defendant"), by and through their counsel, hereby stipulate and agree to extend the time by which Defendant is required to respond to or answer Plaintiff's Amended Complaint until November 3, 2024.

If Defendant is to file a Rule 12 Motion, the Parties agree to and seek the Court's approval for the following proposed briefing schedule:

- Defendant's Motion to Dismiss: November 4, 2024;
- Plaintiff's Opposition to Motion to Dismiss: November 25, 2024; and
- Defendant's Reply: December 3, 2024.

Dated: October 3, 2024 /s/ Gary M. Klinger

Gary M. Klinger

MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC

227 W. Monroe Street, Suite 2100

Chicago, IL 60606

Phone: (866) 252-0878 gklinger@milberg.com

Vicki J. Maniatis

MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC

100 Garden City Plaza, Suite 500 Garden City, New York 11530 Tel.

(865)412-2700

vmaniatis@milberg.com

Attorneys for Plaintiff

Dated: October 3, 2024

## /s/ Steven M. Richman

Steven M. Richman

Myriah V. Jaworski

Chirag H. Patel

## **CLARK HILL**

210 carnegie Center

Suite102

Princeton, NJ 08540

(609-785-2911

srichman@clarkhill.com

mjaworski@clarkhill.com

cpatel@clarkhill.com

Attorneys for Defendant, Everest Global Services, Inc

SO ORDERED. No further extensions will be granted.

Dated: October 7, 2024

J. Brendan Day United States Magistrate Judge